



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
ADVISORY COMMITTEE ON NUCLEAR WASTE  
WASHINGTON, DC 20555 - 0001**

June 21, 2005

The Honorable Nils J. Diaz  
Chairman  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**SUBJECT: PROPOSED RULE ON NATIONAL SOURCE TRACKING OF SEALED  
SOURCES**

Dear Chairman Diaz:

During its 159<sup>th</sup> meeting on April 18-19, 2005, the Advisory Committee on Nuclear Waste (ACNW) discussed a proposed rule that would require a national source tracking system for sealed radioactive sources. The ACNW also discussed sealed source tracking and control during its 156<sup>th</sup> meeting December 13-14, 2004. The Committee had the benefit of discussions with the Department of Energy, the Maryland Department of the Environment/Radiological Health Program, the Conference of Radiation Control Program Directors (CRCPD), and the NRC staff.

The Committee commends the NRC staff for its leadership in creating a U.S. sealed source tracking system. The system will focus on larger sources that pose greater risks. The Committee believes that the tracking system, as currently envisioned, is appropriate. The system requires the owners of large sources to register them when manufactured or received, report changes of ownership when transfer is completed, and annually verify their inventory.

The Committee offers the following recommendations.

- The system is intended to operate online. As a consequence, care must be taken to ensure the tracking system remains secure from unauthorized entry while still being accessible to users.
- Information will be entered into the system by the manufacturers or owners of the sealed sources. The quality of the information entered into the system must be ensured.
- The Committee continues to see significant progress in the planning for control and tracking of sealed sources. While the proposed sealed source tracking system is an appropriate and useful first step, the Committee believes a continuing effort is needed to make the tracking system comprehensive, consistent, and risk informed. Federal and State agencies, the CRCPD, and the Organization of Agreement States should be encouraged to participate.

We look forward to continuing to work with the staff and the other interested parties as they develop a national source tracking system.

Sincerely,

**/RA/**

Michael T. Ryan  
Chairman

Reference:

E-mail to R. Major from M. Horn, dated 3/30/2005, Subject: Proposed Rule—National Source Tracking of Sealed Sources (RIN 3150-AH48), undated, official use only